

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

FEB 3 1982

OFFICE OF PESTICIDES AND TOXIC SUBSTANCES

SUBJECT: EPA Reg. Nos. 264-29, -141,-142,-137,-248, and -336.

Request for new source of NAA.

FROM:

Richard Loranger, Chemist

R. Foranger

Residue Chemistry Branch

Hazard Evaluation Division (TS-769)

T0:

Robert J. Taylor, Product Manager 25

Fungicide-Herbicide Branch

Registration Division (TS-767)

and

Toxicology Branch

Hazard Evaluation Division (TS-769)

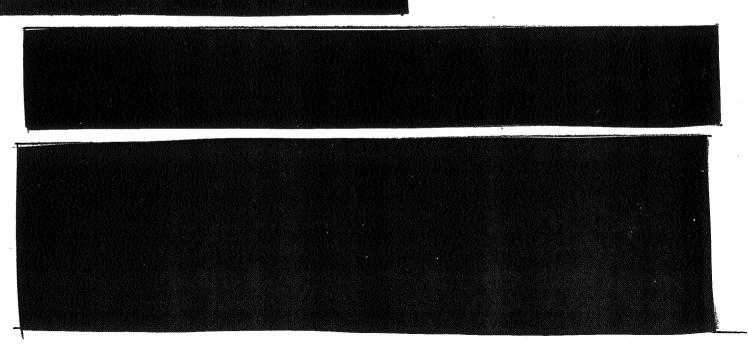
THRU:

Charles L. Trichilo, Chief

Residue Chemistry Branch

Hazard Evaluation Division (TS-769)

Union Carbide has requested that be registered as an alternate source of supply for naphthalene acetic acid (NAA), its sodium salt, and its amide and ethyl ester derivatives.



We conclude that, although the products are very similar, they are not identical due to impurity differences discussed above. According to SOP 3068.2 we defer to TOX for a risk assessment concerning the differences between these products. No residue problems are anticipated from the impurities in the NAA products.

Conclusion

Based on the different impurity levels discussed above (especially

We defer to TOX for an incremental risk assessment concerning the differences between

No residue problems are expected from the impurities in these products.

Attachment

cc: Circ, R.F., Reviewer, TOX, Naphthalene Acetic Acid S.F. Amended use file

TS-769:Reviewer:R.Loranger:LDT:X77324:CM#2:RM:810:Date:2/2/82 RDI:Section Head:RJH:Date:2/2/82:RDS:Date:2/2/82